

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GLOBAL GAMING PHILIPPINES, LLC,

Plaintiff,

vs.

ENRIQUE K. RAZON, JR.; et al.,

Defendants.

No. 21 Cv. 2655 (LGS)(SN)

**NOTICE OF PLAINTIFF GLOBAL GAMING PHILIPPINES, LLC'S MOTION TO
EXCLUDE TESTIMONY OF FREDERIC GUSHIN AND DANIEL REEVES**

PLEASE TAKE NOTICE that Plaintiff Global Gaming Philippines, LLC (“GGAM”), upon the accompanying Memorandum of Law and the Declaration of Kevin N. Ainsworth and exhibits thereto, by and through their counsel, will move this Court for an order pursuant to Federal Rules of Evidence 104, 401, 402, and 702 to exclude the report and testimony of Frederic Gushin and Daniel Reeves, offered by Defendants Bloomberry Resorts and Hotels, Inc. (“BRHI”), and Sureste Properties, Inc. (“SPI” or “Sureste”). This motion is made following the conference of counsel, which took place on November 7, 2022.

Dated: November 15, 2022
New York, New York

Respectfully submitted,
MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY AND POPEO, P.C.

/s/ Kevin N. Ainsworth _____

Kevin N. Ainsworth
Jason P.W. Halperin
Daniel T. Pascucci
Joseph R. Dunn
Barry A. Bohrer
Kaitlyn A. Crowe

666 Third Avenue
New York, NY 10017
T: (212) 935-3000
F: (212) 983-3115
kainsworth@mintz.com
jhalperin@mintz.com
dtpascucci@mintz.com
jrdunn@mintz.com
bbohrer@mintz.com
kacrowe@mintz.com

*Attorneys for Plaintiff
Global Gaming Philippines, LLC*